

REMARKS/ARGUMENTS

35 U.S.C. §102 Rejection, Levchin et al.

The Office Action has rejected claims 1 - 24 under 35 U.S.C. §102(e) as being unpatentable over the cited portions of U.S. Patent No. 7,089,208 to Levchin et al. (hereinafter "Levchin").

The independent claims have been amended to clarify certain aspects of the invention and various amendments have been made to the dependent claims for consistency with those amendments. In particular, the claims have been amended to clarify that the user may interface with the system via one of several possible interfaces, the handler includes one of several possible handlers, and the amount or value may be converted from one form to another form by a payment conversion function.

The combination of limitations in the amended claims embraces a method and system that effect transfers of value between a stored value system and a handler. In embodiments, the stored value system is operable to interface with several, disparate handlers. Thus, the stored value system allows for the exchange of value in many forms in a flexible manner. Further, the user may interface with the stored value system using one of several, disparate interfaces. As such, the user need not only use an internet interface.

The amended claims 1 and 19 are distinct from what is disclosed in Levchin, which instead describes transfers of value within a single system having only one financial server and one interface. The Levchin system uses only a single financial server. *See Levchin*, col. 5, line 55 – col. 6, line 3. The financial server interacts with credit card companies, banks, and the like. *Id.* However, the financial server does not function as a set of separate handlers that are custom-designed for the entity with which the handler interfaces. Further, there is no need to determine which handler to choose in the Levchin system because there is only one financial server.

The claimed method includes several handlers, each handler interacting with a specific outside entity. As such, the handler is determined for the transaction. The different

handlers allows for a more flexible approach to customizing the interface between the handler and an outside entity. With Levchin, the financial server would need to be upgraded every time one outside entity required a change.

In addition, the amended claims 1 and 19 are distinct from Levchin in that the user may use one of several interfaces. The Levchin system allows a user to input value into the stored value account using several instruments, e.g., a credit card, check, etc. However, the user interfaces with the system using a computer system interface, such as a portable computing device. *See Levchin*, col. 3, ll. 34 - 53. Thus, Levchin limits the flexibility of the system by forcing the user to employ a computer system to exchange value.

The claimed method includes several interfaces that allow a user to exchange value. Thus, the user can still use the stored value system even if the user is away from a computer. With Levchin, the user must use a computer.

With respect to the specific claim language, Levchin does not anticipate the independent claims because it does not teach or suggest “the user using an interface to communicate with the server computer system, the interface comprising one of a group including a phone interface, an agent interface, an internet interface, a kiosk interface, and an ATM interface,” or “the handler comprising one of a group including a promotion handler, a credit card handler, a debit card handler, a bank handler, and an agent handler.” Levchin instead discloses a single user interface and a single financial server.

Since these limitations are not taught or suggested by the cited art, each of the independent claims is believed to be patentable over that art. The various dependent claims are similarly believed to be patentable by virtue of their dependence from patentable claims.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The applicants have not acquiesced to any argument not addressed in this response and reserve the right to make further amendments or arguments for patentability in response to those unaddressed arguments. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

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PATENT

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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